

PCL:SEC:2023:2070

06.09.2023

BSE Limited,  
1st Floor, New Trading Ring,  
Rotunda Building, P.J. Towers,  
Dalal Street, Fort,  
**MUMBAI-400 001.**

Sub.: **Business Responsibility and Sustainability Report for the Financial Year 2022-23.**

Dear Sir,

Pursuant to the provisions of Regulation 34(2)(f) of the SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015, we are submitting herewith the Business Responsibility and Sustainability Report for the financial year 2022-23, which also forms part of the Annual Report for financial year 2022-23.

The Annual Report for the financial year 2022-23 is also available on the website of the company at [www.primochemicals.in](http://www.primochemicals.in).

Please take the same on record.

Thanking you,

Yours faithfully,  
For Primo Chemicals Limited  
(Formerly known as Punjab Alkalies & Chemicals Limited)

SUGANDHA KUKREJA  
Company Secretary & Compliance Officer

Encl.: As above

**PRIMO CHEMICALS LIMITED**

(FORMERLY KNOWN AS PUNJAB ALKALIES & CHEMICALS LIMITED)

REGD. OFFICE S.C.O. 125-127, SECTOR 17-B, CHANDIGARH-160017 CORPORATE OFFICE : PLOT NO. 46-50, SECTOR 31-A, CHANDIGARH-160030  
PHONE : 0172-4072508-569, EMAIL : [INFO@PRIMOchemicals.IN](mailto:INFO@PRIMOchemicals.IN) CIN: L24119CH1975PLC003607 WEBSITE : [WWW.PRIMOchemicals.IN](http://WWW.PRIMOchemicals.IN)

WORKS : NANGAL-UNA ROAD, NAYA NANGAL-140126 DISTT. ROPAR, PUNJAB, INDIA

## Annexure – VII to the Directors' Report

# Business Responsibility & Sustainability Report

## SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity			
1.	Corporate Identity Number (CIN) of the Listed Entity	L24119CH1975PLC003607	
2.	Name of the Listed Entity	Primo Chemicals Limited	
3.	Year of incorporation	1975	
4.	Registered office address	SCO 125-127, Sector 17-B, Chandigarh	
5.	Corporate address	Bay No 46-50, Sector 31-A, Chandigarh	
6.	E-mail	secretarial@primochemicals.in	
7.	Telephone	0172-2801628	
8.	Website	www.primochemicals.in	
9.	Financial year for which reporting is being done	2022-23	
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited	
11.	Paid-up Capital	Rs. 48.46 crores	
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	CS Sugandha Kukreja secretarial@primochemicals.in 0172-2801628	
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone Basis	
II. Products/services			
14.	Details of business activities (accounting for 90% of the turnover):		
	<b>S. No.</b>	<b>Description of Main Activity</b>	<b>Description of Business Activity</b>
	1.	Manufacturing of Chemicals	Manufacturing and Selling of Chemicals
			<b>% of Turnover of the entity</b>
			100%
15.	Products/Services sold by the entity (accounting for 90% of the entity's Turnover):		
	<b>S. No.</b>	<b>Product/Service</b>	<b>NIC Code</b>
	1.	Chemicals	2411
			<b>% of total Turnover contributed</b>
			100%
III. Operations			
16.	Number of locations where plants and/or operations/offices of the entity are situated:		
	<b>Location</b>	<b>Number of plants</b>	<b>Number of offices</b>
	National	1	2
	International	-	-
			<b>Total</b>
			3
			-

17.	Markets served by the entity:						
a.	Number of locations						
	<b>Locations</b>			<b>Number</b>			
	<b>National (No. of States)</b>			1			
	<b>International (No. of Countries)</b>			-			
b.	What is the contribution of exports as a percentage of the total turnover of the entity? NIL						
c.	A brief on types of customers The Company access to customers in North India such as Soap, Paper, Textile, Refineries and fertilizers manufacturing industries in Performance Chemicals including Specialty and other Chemicals and Industrial Chemicals.						
<b>IV. Employees</b>							
18.	Details as at the end of Financial Year:						
a.	Employees and workers (including differently abled):						
	<b>S. No.</b>	<b>Particulars</b>	<b>Total (A)</b>	<b>Male</b>		<b>Female</b>	
				<b>No. (B)</b>	<b>% (B / A)</b>	<b>No. (C)</b>	<b>% (C / A)</b>
	<b>EMPLOYEES</b>						
	1.	Permanent (D)	143	130	90.91%	13	9.09%
	2.	Other than Permanent (E)	14	13	92.86%	1	7.14%
	3.	<b>Total employees (D + E)</b>	<b>157</b>	<b>143</b>	<b>91.08%</b>	<b>14</b>	<b>8.92%</b>
	<b>WORKERS</b>						
	4.	Permanent (F)	242	228	94.21%	14	5.79%
	5.	Other than Permanent (G)	248	245	98.79%	3	1.21%
	6.	<b>Total workers (F + G)</b>	<b>490</b>	<b>473</b>	<b>96.53%</b>	<b>17</b>	<b>3.47%</b>
b.	Differently abled Employees and workers:						
	<b>S. No.</b>	<b>Particulars</b>	<b>Total (A)</b>	<b>Male</b>		<b>Female</b>	
				<b>No. (B)</b>	<b>% (B / A)</b>	<b>No. (C)</b>	<b>% (C / A)</b>
	<b>DIFFERENTLY ABLED EMPLOYEES</b>						
	1.	Permanent (D)		NIL			
	2.	Other than Permanent (E)					
	3.	<b>Total differently abled employees (D + E)</b>					
	<b>DIFFERENTLY ABLED WORKERS</b>						
	4.	Permanent (F)		NIL			
	5.	Other than Permanent (G)					
	6.	<b>Total differently abled workers (F + G)</b>					
19.	Participation/ Inclusion/ Representation of women						
			<b>Total (A)</b>	<b>No. and percentage of Females</b>			
				<b>No. (B)</b>	<b>% (B / A)</b>		
		Board of Directors (Other than MD & ED)	6	1	16.67%		
		Key Management Personnel	4	1	25%		

20.	Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)									
		FY 2022-23			FY 2021-2022			FY 2020-2021		
		(Turnover rate in Current FY)			(Turnover rate in Previous FY)			(Turnover rate in the year prior to the previous FY)		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
	Permanent Employees	4.92%	26.09%	6.74%	8.00%	0.00%	7.35%	0.83%	7.69%	1.50%
	Permanent Workers	3.17%	0.00%	2.99%	2.88%	0.00%	2.72%	3.14%	0.00%	2.98%
<b>V. Holding, Subsidiary and Associate Companies (including joint ventures)</b>										
21.	(a) Names of holding / subsidiary / associate companies / joint ventures									
	S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)			Indicate whether holding/ Subsidiary/ Associate/ Joint Venture		% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)		
	1	Flow Tech Chemicals Pvt. Ltd.			Associate		49%	No		
<b>VI. CSR Details</b>										
22.	(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: <b>(Yes/No) Yes</b> (ii) Turnover (in Rs. Crores): 707.38 (iii) Net worth (in Rs. Crores): 362.48									
<b>VII. Transparency and Disclosures Compliances</b>										
23.	Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:									
	Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)		FY 2022-23 Current Financial year			FY 2021-2022 Previous Financial year			
		(If Yes, then provide web-link for grievance redress policy)		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	
	Communities	Yes, a mechanism is in place to interact with community leaders to understand and address their concerns, if any		1. (Complaint received through NGT OA/187 dated. 20.04.2022)	NIL	Complaint disposed off by NGT	NIL	NIL	-	

Investors (other than shareholders)	Yes, the contact no., address and email id of different locations have been specified on the following link. <a href="https://www.primochemicals.in/page/investors">https://www.primochemicals.in/page/investors</a>	NIL	NIL	-	NIL	NIL	-
Shareholders	Yes, Shareholder can register their grievances at <a href="https://scores.gov.in/scores/Welcome.html">https://scores.gov.in/scores/Welcome.html</a> and also web links of BSE ( <a href="http://tiny.cc/m1l2vz">http://tiny.cc/m1l2vz</a> ) The contact no., address and email id have been specified on the following link. <a href="https://www.primochemicals.in/page/investors">https://www.primochemicals.in/page/investors</a>	11	NIL	-	1	NIL	-
Employees and workers	Yes, the Company has in place Whistle Blower mechanism and Prevention of Sexual Harassment Policy specifying the grievance redressal mechanism. <a href="https://www.primochemicals.in/page/contact-us">https://www.primochemicals.in/page/contact-us</a> .	NIL	NIL	-	NIL	NIL	-
Customers	The contact no., address and email id of different locations have been specified on the following link. <a href="https://www.primochemicals.in/page/contact-us">https://www.primochemicals.in/page/contact-us</a> .	26	NIL	Complaints pertain to lower quality material received at costumer's end as compared to material dispatched	23	NIL	Complaints pertain to lower quality material received at costumer's end as compared to material dispatched
		5	NIL	Cl2 Tonner Leakage	3	NIL	-

	Value Chain Partners	The contact no., address and email id of different locations have been specified on the following link. <a href="https://www.primochemicals.in/page/contact-us">https://www.primochemicals.in/page/contact-us</a> .	NIL	NIL	-	NIL	NIL	-												
	Other (please specify)	-	-	-	-	-	-	-												
24.	<p>Overview of the entity's material responsible business conduct issues</p> <p>Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format:</p> <table border="1"> <thead> <tr> <th>S. No.</th> <th>Material issue identified</th> <th>Indicate whether risk or opportunity (R/O)</th> <th>Rationale for identifying the risk / opportunity</th> <th>In case of risk, approach to adapt or mitigate</th> <th>Financial implications of the risk or opportunity (Indicate positive or negative implications)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Water Management</td> <td>Risk</td> <td>Water is a critical input in chemical production. Companies with water-intensive operations face a greater risk of operational disruption due to water scarcity, which can also increase water procurement prices and capital expenditures. Similarly, chemical manufacturing generates process wastewater that must be treated before disposal. Noncompliance with water quality regulations may result in regulatory compliance and mitigation costs.</td> <td>As a responsible chemical manufacturing organization, we put a premium on the ability to moderate water consumption. We have upgraded our wastewater management by replacing normal wastewater treatment with new age technology. This replacement moderated water and power consumption, helping moderate environment impact and conserve natural resources. The company also invested various water conservation schemes, this water is further used in the cooling tower and for other processes.</td> <td>Negative</td> </tr> </tbody> </table>								S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)	1.	Water Management	Risk	Water is a critical input in chemical production. Companies with water-intensive operations face a greater risk of operational disruption due to water scarcity, which can also increase water procurement prices and capital expenditures. Similarly, chemical manufacturing generates process wastewater that must be treated before disposal. Noncompliance with water quality regulations may result in regulatory compliance and mitigation costs.	As a responsible chemical manufacturing organization, we put a premium on the ability to moderate water consumption. We have upgraded our wastewater management by replacing normal wastewater treatment with new age technology. This replacement moderated water and power consumption, helping moderate environment impact and conserve natural resources. The company also invested various water conservation schemes, this water is further used in the cooling tower and for other processes.	Negative
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2.	Handling of Hazardous Chemicals	Risk	<p>Chemical company is responsible for managing all risks related to the storage and handling of hazardous chemicals. The improper handling of chemicals and spills can cause harm to the environment or humans and also imposes a heavy fine and reputational risk on the company.</p>	<p>Company ensures that hazardous materials are handled in a manner that mitigates risks to the environment, employees, and the community. In order to maintain the health &amp; safety at workplace company conducts lot of internal and external health and safety audits. Also, the environmental and social parameters relevant are information is provided with the product. In case of hazardous waste, company ensure the waste is managed as per waste management rules and regulations.</p>	Negative
3.	Waste Management	Risk	<p>Typically, waste is generated as part of a company's operations, captive power plant, maintenance of machinery and office administrative work. Improper waste handling may contribute to air pollution, climate change, and various direct and indirect impacts on the ecosystem. It may also cause health and safety risks to personnel exposed to the waste. Non-compliance with waste management regulations may lead to the imposing of heavy fines.</p>	<p>The company replaced and switched to various new technology to reduce the waste generation. This replacement helped to reduce the consumption of a natural resource, reduced waste generation and waste disposal in open land. Additionally the company is taking care of it's Plastic Waste generated by it's products and packaging responsibly.</p>	Negative

4.	Product Safety & Quality	Risk	Product safety and quality is a critical issue for companies in the Chemicals industry. Chemicals' potential to have negative effects on human health or the environment throughout the usage phase can affect consumer demand for the product and regulatory risk, which can then damage sales and lead to higher operational costs, regulatory compliance costs, and mitigation.	To ensure the safety of the product environmental and social parameters relevant to the product such as Safe and responsible usage, Recycling or safe disposal are attached on product packaging. Also we have quality labs at the plant which help us to maintain the product quality. We invested in a combination of standard operating protocols and certifications (ISO 9001 and ISO 14001), strengthening the company's alignment with Quality Management System, Good manufacturing Practices and Standard Operating Procedures.	Negative
5.	Health & Safety	Risk	In chemical industry, Health & Safety can directly impact people and community and disrupt the operations	Health & Safety Management Plan, Process Safety & Risk Management, Emergency Mitigation System etc	Negative
6.	Business Ethics	Risk	This may impact the brand and trust of stakeholders	Monitoring Mechanism to ensure Ethical Conduct	Negative
7.	Regulatory Issues and Compliance	Risk	Non-compliance may impact the brand image and customer trust and engagement	Adherence to compliance monitoring system	Negative
8.	Energy Efficiency	Opportunity	This may minimise the greenhouse gas (GHG) emissions, improve resource efficiency, cost saving, cleaner environment etc.	Energy saving assessments, key initiatives to optimise energy efficiency.	Positive



## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions		P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1.	a. Whether your entity's policy cover each principle and its core elements of the NGRBCs. (Yes/No)				Yes					
	b. Has the policy been approved by the Board? (Yes/No)				Yes					
	c. Web Link of the Policy, if available				www.primochemicals.in					
2.	Whether the entity has translated the policy into procedures. (Yes / No)				Yes					
3.	Do the enlisted policy extend to your value chain partners? (Yes/No)				Yes					
4.	Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.				ISO 9001:2015 (QMS) ISO 14001:2015 (EMS) FSSC :22000: 2018 (FSMS) ISO 50001:2018 (EnMS) BIS: 252 2013, (For Caustic Soda Lye) BIS:1065 Part 2 – 2019 (For SBP)					
5.	Specific commitments, goals and targets set by the entity with defined timelines, if any.				In alignment with vision of the Company, Primo, through its CSR initiatives, shall continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a Socially Responsible Corporate Citizen with environmental concern; Safety and Environment.  The company is also taking proper control measures for health and safety of employees and workers and nearby residents and communities, climate change, pollution management and emission control.					
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.				N.A.					
<b>Governance, leadership and oversight</b>										
7.	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements  The Company is committed to run its operations in an environment-friendly manner. The Company's endeavor is to take all possible measures towards ensuring safety, pollution control and good housekeeping across all its Plants. Online Monitoring System has been installed at Works as per requirement of Central Pollution Control Board. It is always top most priority of the Company to follow strong Environmental, Social and Governance (ESG) principles int its business for building a sustainable business for the future. The Company is also having separate policies for Corporate Social Responsibility, Code of Conduct, Whilste Blower Policy and POSH.									

8.	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Shri Naveen Chopra Managing Director																	
9.	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	The Company does not have any specific committee to oversee the implementation of the Policy. The Managing Director oversees the implementation.																	
10.	Details of Review of NGRBCs by the Company:																		
<b>Subject for Review</b>		<b>Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee</b>									<b>Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)</b>								
		P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action		Yes									Annually								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances		Yes									Quarterly								
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9	The BR policy is evaluated internally								
12.	If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:																		
<b>Questions</b>		P1	P2	P3	P4	P5	P6	P7	P8	P9	N.A.								
a) The entity does not consider the Principles material to its business (Yes/ No)																			
b) The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)																			
c) The entity does not have the financial or/ human and technical resources available for the task (Yes/No)																			
d) It is planned to be done in the next financial year (Yes/No)																			
e) Any other reason (please specify)																			

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

**PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.**

### Essential Indicators

- Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of training and awareness programs held	Topics / principles covered under the training and it impacts	% of persons in respective categories covered by the awareness programs
Board of Directors (Incl. MD and ED)	3	The Company conducts familiarization programs for its Board of Directors at regular intervals which covers topics such as Project Status.  The Directors of the Company had also visited Plant located at Naya Nangal.	100%
Key Management Personnel	2	Prevention of Sexual Harassment (POSH), Women Empowerment	100%
Employees other than BOD and KMP	32	Prevention of Sexual Harassment (POSH), IND AS (Indian Accounting Standards), Fire Safety & Emergency Handling, GST, Wellness, ERP Trainings, Women Empowerment, Working on HRIMS, Labour Law, Inventory Control & Material Management, Energy management system), Energy Efficient lighting Equipment & Motor.	41.25%
Workers	21	Fire Safety and Emergency Handling, Importance of wearing Helmets, Personal Protective Equipment (PPE), Safe Handling and transportation of Chemicals, Prevention of Sexual Harassment (POSH), Energy Efficient lighting Equipment & Motor, Health & Wellness, Electrolysis & cell Efficiency and Road Safety	49.17%

- Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	-	N.A.	0	-	
Settlement	-	N.A.	0	-	
Compounding fee	-	N.A.	0	-	
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in INR)	Brief of the case	Has an appeal been preferred? (Yes/No)
Imprisonment	-	N.A.	-	-	
Punishment	-	N.A.	-	-	

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
N.A.	N.A.

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes

The Company's Code of Conduct highlights its zero-tolerance policy towards corruption, bribery, or giving or receipt of bribes. The Company strives to attain its purpose through compliance legal and ethical requirements, applicable laws, rules and regulations.

Please find the link of the policy at <https://www.primochemicals.in/page/investors>.

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

Case Details	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
Directors	-	-
KMPs	-	-
Employees	-	-
Workers	-	-

6. Details of complaints with regard to conflict of interest:

	FY 2022-23		FY 2021-2022	
	Number	Remarks	Number	Remarks
Number of Complaints received in relation to issues of Conflict of Interest of the Directors	NIL	N.A.	NIL	N.A.
Number of Complaints received in relation to issues of Conflict of Interest of the KMPs	NIL	N.A.	NIL	N.A.

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

Not Applicable

### Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
4	Safe Handling of Chlorine	2.66%
4	Use of PPE's	11.42%
8	Height Safety	22.85%

2. Does the entity have processes in place to avoid / manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes

All the Directors of the Company discloses his/her concern or interest in the Company or Companies or bodies corporate, firms, or other association of individuals and any change therein, annually or upon any change, which includes the shareholding.

Further, a declaration is also taken annually from the Directors under the Code of Conduct confirming that they will always act in the interest of the Company and ensure that any other business or personal association which they may have, does not involve any conflict of interest with the operations of the Company and the role therein. In the Meetings of the Board, the Directors abstain from participating in the items in which they are concerned or interested.

### **PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe.**

#### Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year	Details of improvement in the environmental and social impact
R&D	-	-	-
Capex	-	-	-

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes

b. If yes, what percentages of inputs were sourced sustainably?

JÍ %

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.
- Plastics (including packaging): As per the Plastic Waste Management rules, the company has laid down a procedure for collecting & segregating plastic waste generated during the process. Further recycling & disposal of plastic is carried out as per the CPCB guidelines.
  - E-waste: The company has standard procedures for handling, storage & disposal of generated E-waste as per E- waste (Management) Rules. Further recycling and disposal of E – generated is carried out as per CPCB guidelines.
  - Hazardous waste: The company has standard operating procedures for handling, storage and disposal of waste generated in the process classified as Hazardous Waste is disposed of as per CPCB and PPCB guidelines related to HWM 2016 rules. We have an agreement in place with the TSDF site for the safe and sustainable disposal of such Hazardous waste.
  - Other waste: None.
4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No, as all products are intermediates in nature & are sold in Trucks, Tankers & Tonners and directly consumed by the customers.

### Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

We have products that exist in the form of Liquid & gaseous state. Therefore, the Production & dispatch is a continuous synchronized process and the same are dispatched immediately after production. Since the product is hazardous in nature so in order to Reduce the Hazard, the storage duration is kept just minimal. Hence Not Applicable.

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
N.A.					

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Not Applicable

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

NIL

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	N.A.	N.A.	3.275 MT (sold as scrap)	N.A.	N.A.	5.078 MT (sold as scrap)
E-waste	NIL	NIL	NIL	NIL	NIL	NIL
Hazardous waste	NIL	NIL	MEE sludge = 179.260 MT	NIL	NIL	MEE sludge = 89.970 MT
Other waste	NIL	NIL	NIL	NIL	NIL	0.066MT

**PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.**

#### Essential Indicators

1. a. Details of measures for the well-being of employees:

Category	Total (A)	% of employees covered by									
		Health Insurance		Accidental Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. B	%B/A	No. C	%C/A	No. D	% D/A	No. E	% E/A	No. F	% F/A
<b>PERMANENT EMPLOYEES</b>											
Male	130	0*	0%	130	100%	-	0%	-	0%	-	0%
Female	13	0*	0%	13	100%	13	100%	-	0%	-	0%
<b>Total</b>	<b>143</b>	<b>0*</b>	<b>0%</b>	<b>143</b>	<b>100%</b>	<b>13</b>	<b>9.09%</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>0%</b>
<b>OTHER THAN PERMANENT EMPLOYEES</b>											
Male	13	0*	0%	13	100%	-	0%	-	0%	-	0%
Female	1	0*	0%	1	100%	1	100%	-	0%	-	0%
<b>Total</b>	<b>14</b>	<b>0*</b>	<b>0%</b>	<b>14</b>	<b>100%</b>	<b>1</b>	<b>7.14%</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>0%</b>

\* All Permanent Employees are covered under the Company's Medical Policy

## b. Details of measures for the wellbeing of the workers

Category	Total (A)	% of workers covered by									
		Health Insurance		Accidental Insurance		Maternity Benefits		Paternity Benefits		Day Care Facilities	
		No. B	%B/A	No. C	%C/A	No. D	% D/A	No. E	% E/A	No. F	% F/A
<b>PERMANENT WORKERS</b>											
Male	228	0**	0%	228	100%	-	0%	-	0%	-	0%
Female	14	0**	0%	14	100%	14	100%	-	0%	-	0%
<b>Total</b>	<b>242</b>	<b>0**</b>	<b>0%</b>	<b>242</b>	<b>100%</b>	<b>14.00</b>	<b>5.79%</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>0%</b>
<b>Other Than Permanent WORKERS</b>											
Male	245	0**	0%	22	100%	-	0%	-	0%	-	0%
Female	3	0**	0%	1	100%	-	0%	-	0%	-	0%
<b>Total</b>	<b>248</b>	<b>0**</b>	<b>0%</b>	<b>23</b>	<b>100%</b>	<b>-</b>	<b>0.00%</b>	<b>-</b>	<b>0%</b>	<b>-</b>	<b>0%</b>

\*\* All Permanent Workers are covered under the Company's Medical Policy.

## 2. Details of retirement benefits, for Current FY and Previous Financial Year.

Benefits	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	96.5%	100%	Y	93.4%	95.91%	Y
Gratuity	100%	100%	N.A.	100%	100%	N.A.
ESI	100%	100%	100%	100%	100%	Y
Others	NIL	NIL	NIL	NIL	NIL	NIL

## 3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, necessary arrangements are made for making premises and office accessible for differently abled employees and workers as per the requirement.

## 4. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	-	-	-	-
Female	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>



5. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy. No
6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Workers	The Company has provision for redressal of grievances of employees and workers. Also, the Company has adopted a Whistleblower Policy which provides mechanism to the employees and directors to report the unethical behavior actual or suspected fraud or violation of Codes of Conduct
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:

Category	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
- Male	130	-	0%	114	-	0%
- Female	13	-	0%	10	-	0%
<b>Total Permanent Employees</b>	<b>143</b>	<b>-</b>	<b>0%</b>	<b>124</b>	<b>-</b>	<b>0%</b>
- Male	228	99	43.4%	214	99	46.3%
- Female	14	09	64.3%	13	09	69.2%
<b>Total Permanent Workers</b>	<b>242</b>	<b>108</b>	<b>44.6%</b>	<b>227</b>	<b>108</b>	<b>47.6%</b>

8. Details of training given to employees and workers:

Category	FY 2022-23 Current Financial Year					FY 2021-2022 Previous Financial Year				
	Total (A)	On Health & Safety Measures		On Skill Upgradation		Total (A)	On Health & Safety Measures		On Skill Upgradation	
<b>EMPLOYEES</b>										
- Male	130	49	37.69%	49	37.69%	114	58	50.88%	65	57.02%
- Female	13	8	61.54%	12	92.31%	10	10	100.00%	10	100.00%
<b>Total</b>	<b>143</b>	<b>57</b>	<b>39.86%</b>	<b>61</b>	<b>42.66%</b>	<b>124</b>	<b>68</b>	<b>54.84%</b>	<b>75</b>	<b>60.48%</b>
<b>WORKERS</b>										
- Male	228	102	44.7%	111	48.68%	214	81	37.85%	75	35.05%
- Female	14	13	92.9%	12	85.71%	13	8	61.54%	9	69.23%
<b>Total</b>	<b>242</b>	<b>115</b>	<b>47.52%</b>	<b>123</b>	<b>50.83%</b>	<b>227</b>	<b>89</b>	<b>39.21%</b>	<b>84</b>	<b>37.00%</b>

## 9. Details of performance and career development reviews of employees and worker:

Category	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
<b>Employees</b>						
Male	130	121	93%	114	28	24.6%
Female	13	13	100%	10	4	40.0%
<b>Total</b>	<b>143</b>	<b>134</b>	<b>93.7%</b>	<b>124</b>	<b>32</b>	<b>25.8%</b>
<b>Workers</b>						
Male	228	199	87.3%	214	82	38.3%
Female	14	11	78.6%	13	11	84.6%
<b>Total</b>	<b>242</b>	<b>210</b>	<b>86.8%</b>	<b>227</b>	<b>93</b>	<b>41.0%</b>

## 10. Health and safety management system:

- a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Primo Chemical's is in process of implementation of Occupational health and safety management system (OSHA) ISO 45001:2018, Principal approval has been accorded by the Management. Consultant / party for Documentation & implementation of the OSHA Standard is being finalized.

- b) What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

- i) HAZOP study by the agencies who have relevant expertise and experience such as tkIS, TSM.
- ii) Safety Audits by the agencies expert in the field i.e., National Safety Council (NSC), Technology supplier / Consultants: Thyssen Krupp tkIS, Mumbai, M/S TSM and Safety consultants, expert in Safety of Caustic -Chlorine Industries in India.
- iii) Regular plant rounds by the safety team along with some Senior team members for identification of any such hazards,
- iv) Safety committee (consisting of management, Staff & Workers) meeting is held on quarterly basis. Issues raised by them related to possible Hazards in the plant are addressed & scheme finalized to mitigate the Hazards are implemented.
- v) Apart from this any hazard or Risk identified by an employee is taken up to the Safety department who further ensures that the same is addressed satisfactorily through the concerned maintenance department.

- c) Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)

Yes, regular Safety Committee meetings wherein Equal participation of Workers is ensured, are held and workers' Safety related issues are taken care by the management wherever technically feasible.

- d) Do the employees/ worker of the entity have access to non-occupational medical and healthcare services?  
(Yes/ No)

Yes

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	-	-
	Workers	-	-
Total recordable work-related injuries	Employees	-	-
	Workers	-	-
No. of fatalities	Employees	-	-
	Workers	-	-
High consequence work-related injury or ill-health (excluding fatalities)	Employees	-	-
	Workers	-	-

12. Describe the measures taken by the entity to ensure a safe and healthy work place.

- i) Trainings are imparted to the workers/ transporters/officers and staff at each level to inculcate the safety culture among them.
- ii) Wearing Safety Helmets is made mandatory in the plant.
- iii) PPE'S have been provided to all the employees after identification of their need & their usage is also ensured by their respective HOS / HODs and Safety department.
- iv) SOP'S prepared specifically for a particular operation, are being followed.

13. Number of Complaints on the following made by employees and workers:

	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	-	-	NIL	-	-	NIL
Health & Safety	-	-	NIL	-	-	NIL

14. Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	>90%
Working Conditions	>90%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

There is no as such incidence that took place in past but still to keep the safety of the Personnel & Plant, various steps have been taken such as Procurement of Firefighting tender, Additional firefighting team to mitigate any risk, Replacement of lights with Flame Proof, exhaust fan non- flammable type, water Curtain around the Cl2 Storage & Cl2 Filling Areas. Near Miss incidences are captured, analyzed and Corrective action taken thereof.

### Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

(A) Employees: Yes

(B) Workers: Yes

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

Primo Chemicals Limited ensures that all the statutory dues are deducted and deposited well in time by the Value Chain Partners. For this purpose, periodic internal and statutory audits are conducted by the Company.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
Employees	-	-	-	-
Workers	-	-	-	-

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100 %
Working Conditions	100 %

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

No significant risks / concerns were identified from the assessments of the health and safety practices and working conditions of value chain partners. However, proper training has been imparted to the workers/transporters about the basic properties of all the products (MSDS), they are regularly taught about the safe handling & transportation of hazardous products such as Caustic, Chlorine, HCl & are provided with the Play cards and they are also provided emergency Contact numbers of Important Persons in case Emergency. Further Toll-free No is also provided to contact, in case of any emergency related to Chlorine (CERN) that may arise during transportation, thereby Nearest Caustic Chlorine Plant persons can be contacted, and requisite Help can be provided.

**PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders.**

**Essential Indicators**

1. Describe the processes for identifying key stakeholder groups of the entity.

The Company has identified its internal and external group of stakeholders and below listed stakeholder groups have an immediate impact on the operations and working of the Company. This includes Employees, Shareholders, Customers, Communities, Suppliers, Partners and Vendors. The company values the input and feedback provided by stakeholders and seeks to maintain strong relationships with them. Through ongoing engagement and communication, the company aims to ensure that the needs and expectations of all stakeholders are met.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employee and Workers	No	Direct & other communication mechanisms, meeting email, notice board.	Ongoing	Company follows an open-door policy, training & development, performance management, etc.
Investors and Shareholders	No	E-mail, newspaper, advertisement, website, Annual General Meetings, disclosures to stock exchanges and investor meetings / calls / conferences	Need based and Quarterly calls	Information about business and statutory approvals
Government and Regulators	No	E-mail, letters, representations, meetings, etc.	Need based	Compliances, approvals, permissions, etc.
Customers and Dealers	No	Meetings	Frequent and need based	Informing them about products of the company, feedback, etc.

Stakeholder Group	Whether identified as Vulnerable & Marginalised Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Banks and Financial Institutions	No	E-mail, letters, representations, meetings, etc.	Frequent and need based	Financial requirements and transactions
Community/ Society	No	Directly or through CSR implementation	Frequent and need based	Education, empowerment, health, infrastructure, conservation, etc.

### Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The sub-committees of the Board ensures interaction between the stakeholders and the Board to ensure their views/feedback on various matters.

- Stakeholders Relationship Cum Share Transfer Committee ensure to address the grievances of the stakeholders.
- Risk Management Committee (RMC) is entrusted with the functions of determining efficacy of risk management framework of the Company, evaluation of risks and mitigating measures. The Risk Management Policy of the Company sets out key risk areas including financial risks, legislative and regulatory risks, environmental risks and operational risks.
- The Corporate Social Responsibility (CSR) Committee ensures feedback from the concerned stakeholders on the CSR initiatives/activities undertaken by the Company.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, the Company engage with its internal and external stakeholders whenever required. The Company takes feedback in respect of its CSR initiatives / activities from the concerned stakeholders.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

Under its CSR initiatives, the Company has been carrying out CSR activities to Ensuring environmental sustainability, ecological balance, Promotion of Health care including Preventive Health care and for Development Neighbourhood by planting trees. Details of the Company's CSR initiatives are available at Annexure-III - Annual Report of Corporate Social Responsibility (CSR) activities.

**PRINCIPLE 5: Businesses should respect and promote human rights.**

**Essential Indicators**

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Total (A)	No. employees workers Covered (B)	% (B / A)	Total (C)	No. employees workers Covered (D)	% (D / C)
<b>EMPLOYEES</b>						
Permanent	N.A.					
Other than permanent						
<b>Total Employees</b>						
<b>WORKERS</b>						
Permanent	N.A.					
Other than permanent						
<b>Total Workers</b>						

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2022-23 Current Financial Year					FY 2021-2022 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	%(B/A)	No. (C)	%(C/A)		No. (E)	%(E/A)	No. (F)	%(F/D)
<b>EMPLOYEES</b>										
<i>Permanent</i>										
Male	130	-	0%	130	100%	114	-	0%	114	100%
Female	13	-	0%	13	100%	10	-	0%	10	100%
<i>Other than Permanent</i>										
Male	13	-	0%	13	100%	4	-	0%	4	100%
Female	1	-	0%	1	100%	1	-	0%	1	100%
<b>WORKERS</b>										
<i>Permanent</i>										
Male	228	-	0%	228	100%	214	-	0%	214	100%
Female	14	-	0%	14	100%	13	-	0%	13	100%
<i>Other than Permanent</i>										
Male	245	185	75.5%	60	24.5%	255	221	86.7%	34	13.3%
Female	3	2	66.7%	1	33.3%	2	2	100%	-	0%

3. Details of remuneration/salary/wages, in the following format:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD) other than MD & ED	5	10,75,000	1	5,75,000
Key Managerial Personnel	3	2,72,87,222	1	20,99,218
Employees other than BOD and KMP	127	69,71,172	12	6,35,200
Workers	228	71,29,961	14	3,81,214

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

No

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The Company has a common mechanism to redress grievances under human rights as for other grievances. Grievances are received through email, letter, or telephonically etc., it is registered by the HR and Admin department at respective locations and its sanity check is done. For complaints which are in the purview of the Code of Conduct committee, merits further investigation. Investigation is either internal or external, based on its severity. The investigator conducts investigation by gathering the data, validating, analyzing and gives his observations and recommendations.

6. Number of Complaints on the following made by employees and workers:

	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	NIL	NIL	-	NIL	NIL	-
Discrimination at workplace	NIL	NIL	-	NIL	NIL	-
Child Labour	NIL	NIL	-	NIL	NIL	-
Forced Labour/ Involuntary Labour	NIL	NIL	-	NIL	NIL	-
Wages	NIL	NIL	-	NIL	NIL	-
Other human rights related issues	NIL	NIL	-	NIL	NIL	-



7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

As part of Whistleblower Policy and POSH Policy, the Company strictly maintains the protection of identity of the complainant. All such matters are dealt in strict confidence. As a part of our policy on Code of Conduct, the Company does not tolerate any form of retaliation or revenge against anyone reporting legitimate concerns.

8. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes

9. Assessments for the year:

	<b>% of your plants and offices that were assessed (by entity or statutory authorities or third parties)</b>
Child labour	100%
Forced/involuntary labour	100%
Sexual harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	NIL

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

There were no audit concerns in the above areas from assessments in FY 2022-23.

#### Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/ complaints.

The Company has policies like Whistle Blower and Sexual Harassment Policy to deal with issues for protecting the rights of all the employees. The Company is motivated to safeguard the human rights of all employees with full zeal.

2. Details of the scope and coverage of any Human rights due-diligence conducted.

NIL

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Not Applicable

## 4. Details on assessment of value chain partners:

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Sexual Harassment	100%
Discrimination at workplace	100%
Child Labour	100%
Forced Labour/Involuntary Labour	100%
Wages	100%
Others – please specify	NIL

## 5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above

There were no audit concerns in the above area from the assessments in FY 2022-23.

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment****Essential Indicators**

## 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

<b>Parameter</b>	<b>FY 2022-23 Current Financial Year (Joules in lacs)</b>	<b>FY 2021-2022 Previous Financial Year (Joules in lacs)</b>
Total electricity consumption (A)	12100343477	9996750574
Total fuel consumption (B)		
Coal:	597727	221980
Furnace Oil:	83959046	97264793
Energy consumption through other sources (C)		
Rice Husk:	229352402	523997477
<b>Total energy consumed</b>	<b>12414252652</b>	<b>10618234824</b>
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	42.31	56.30
Energy intensity (optional)–the relevant metric may be selected by the entity	-	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

## 2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

The PAT cycle -II period from 01.04.2016 to 31.03.2019 and target SEC is 0.2582 but against target we have achieved SEC is 0.2840 in FY 2018-19.

In PAT cycle -II we have not achieved the target SEC and 2488 Energy Certificates are required to avoid the penalty. The 1245 no's Energy certificates were gained in PAT cycle -I and the rest 1243 no's Energy certificates are procured through trading.

Now we are in PAT cycle -VII and its period from 01.04.2022 to 31.03.2025. The target SEC is 0.2762 which should be achieved in FY 2024-25 and SEC of current FY i.e., 2022-23 is 0.253.

3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	504480 KL	507072 KL
(ii) Groundwater	NIL	NIL
(iii) Third party water	NIL	NIL
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>504480 KL</b>	<b>507072 KL</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>504480 KL</b>	<b>507072 KL</b>
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water	NIL	NIL
- No treatment		
- With treatment - please specify level of treatment		
(ii) Into Groundwater	NIL	NIL
- No treatment		
- With treatment - please specify level of treatment		
(iii) Into Seawater	NIL	NIL
- No treatment		
- With treatment - please specify level of treatment		
(iv) Sent to third-parties	NIL	NIL
- No treatment		
- With treatment - please specify level of treatment		
(v) Others	IN-PROCESS	IN-PROCESS
- No treatment	NIL	NIL
- With treatment - please specify level of treatment	Chemical, Mechanical, RO then MEE	Chemical, Mechanical, RO then MEE
<b>Total water recycled (in kilolitres)</b>	<b>28775 KL</b>	<b>26400 KL</b>

Note: Indicate if any independent assessment/ evaluation/assurance have been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Yes, our industry follows Zero Liquid Discharge Philosophy. Effluent generated from industry is segregated into High TDS & Low TDS effluent. The high TDS effluent is treated in MEE & Low TDS effluent is treated in RO Plant. The permeate separated after treatment is taken back into Process system through Cooling Tower make up & the Hazardous waste MEE sludge after drying is sent to PPCB approved TSDF facility @ Nimbua, for the safe treatment & disposal.

5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
NOx	mg/Nm <sup>3</sup>	N.A.	N.A.
SOx	mg/Nm <sup>3</sup>	N.A.	N.A.
Particulate matter (PM)	mg/Nm <sup>3</sup>	54	62
Persistent organic pollutants (POP)	mg/Nm <sup>3</sup>	N.A.	N.A.
Volatile organic compounds (VOC)	mg/Nm <sup>3</sup>	N.A.	N.A.
Hazardous air pollutants (HAP)	mg/Nm <sup>3</sup>	Within prescribed limits as per MOEF /CPCB guidelines.	Within prescribed limits as per MOEF /CPCB guidelines.
Others - please specify	N.A.	N.A.	N.A.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, M/s Mantec Consultants Pvt. Ltd. Noida.

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	NIL	NIL
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	NIL	NIL
<b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>	-	NIL	NIL
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	NIL	NIL

Note: Indicate if any independent assessment/ evaluation/assurance have been carried out by an external agency? (Y/N) If yes, name of the external agency.

7. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

Yes i.e Use of Hydrogen Gas as fuel in Boilers instead of fossil fuel like Coal & Furnace Oil.

8. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
Total Waste generated (in metric tonnes)		
Plastic waste (A)	5275.4 T V	5077 T V
E-waste (B)	NIL	NIL
Bio-medical waste (C)	0 T V	0 T V
Construction and demolition waste (D)	NIL	NIL
Battery waste (E)	NIL	0 T V
Radioactive waste (F)	NIL	NIL
Other Hazardous waste. Please specify, if any. (G)	Category 5.1 nil Category 17.2 2686.160 MT Category 35.3 108.870 MT	Category 5.1 nil Category 17.2 2200.094 MT Category 35.3 84.236 MT
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	Non-hazardous Brine Sludge = 2467.923 MT	Non-hazardous Brine Sludge = 2313.557 MT
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>5266.249</b>	<b>4603.038</b>
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled (Category 17.2 sold to authorized recycler)	2672.630 MT	2175.740 MT
(ii) Re-used	NIL	NIL
(iii) Other recovery operations	NIL	NIL
<b>Total</b>	<b>2672.630 MT</b>	<b>2175.740 MT</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	NIL	NIL
(ii) Landfilling	NIL	NIL
(iii) Other disposal operations (Category 35.3 sent to TSDF)	179.260 MT	89.970 MT
<b>Total</b>	<b>179.260 MT</b>	<b>89.970 MT</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, by M/s Mantec Consultants Pvt. Ltd. Noida.

9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

Our industry follows Zero Liquid Discharge Philosophy. Effluent generated from industry is segregated into High TDS & Low TDS effluent. The high TDS effluent is treated in MEE & Low TDS effluent is treated

in RO Plant. The permeate separated after treatment is taken back into Process system through Cooling Tower make up & the Hazardous waste MEE sludge after drying is sent to PPCB approved TSDF facility @ Nimbua, for the safe disposal.

The company has put in place several initiatives a) to reduce manufacturing rejects as part of the resource optimization and waste minimization process, and b) to reduce generation of hazardous waste and toxic chemicals by source reduction through plant modifications, waste recovery, recycle or waste treatment through destruction.

10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Nangal-Una-Road, Naya Nangal	Chemical	Yes

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
EC Amendment for AICI3	IA/PB/IND3/291892/2022	20 <sup>th</sup> September 2022	Yes, by M/s Kadam Environmental Consultants, Baroda, Gujrat	Yes	<a href="https://www.primochemicals.in/">https://www.primochemicals.in/</a>
EC for Paracetamol Project	IA/PB/IND3/247968/2021	18 <sup>th</sup> February 2022	Yes, by M/s Kadam Environmental Consultants, Baroda, Gujrat	Yes	<a href="https://www.primochemicals.in/">https://www.primochemicals.in/</a>

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes , Our Industry is comply with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder

S. No.	Specify the law / regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
N.A.				

### Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2022-23 Current Financial Year (Joules in lacs)	FY 2021-2022 Previous Financial Year (Joules in lacs)
<b>From renewable sources</b>		
Total electricity consumption (A)	NIL	NIL
Total fuel consumption (B)	NIL	NIL
Energy consumption through other sources (C)	NIL	NIL
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>NIL</b>	<b>NIL</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D)	12100343477	9996750574
Total fuel consumption (E)		
Coal:	597727	221980
Furnace Oil:	83959046	97264793
Energy consumption through other sources (F) Rice Husk:	229352402	523997477
<b>Total energy consumed from non-renewable sources</b>	<b>12414252652</b>	<b>10618234824</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, by NITCON, Forbes Marshall, IIT, Ropar

2. Provide the following details related to water discharged:

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(ii) To Groundwater	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(iii) To Seawater	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
(iv) Sent to third-parties	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(v) Others	It is a ZLD Plant & waste water generated is treated through RO/ MEE & treated water is used back in process system.	It is a ZLD Plant & waste water generated is treated through RO/MEE & treated water is used back in process system.
- No treatment		
- With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>	<b>Nil, because our Industry follows ZLD Policy.</b>	<b>Nil, because our Industry follows ZLD Policy.</b>

3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

Not Applicable

For each facility / plant located in areas of water stress, provide the following information:

- i) Name of the area: Not Applicable
- ii) Nature of operations: Not Applicable
- iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	₹	₹
(ii) Groundwater	NIL	NIL
(iii) Third party water	NIL	NIL
(iv) Seawater / desalinated water	NIL	NIL
(v) Others	NIL	NIL
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>B=@</b>	<b>B=@</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>B=@</b>	<b>B=@</b>
<b>Water intensity per rupee of turnover (Water consumed / turnover)</b>	<b>B=@</b>	<b>B=@</b>
<b>Water intensity (optional) – the relevant metric may be selected by the entity</b>		



Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Water discharge by destination and level of treatment (in kiloliters)</b>		
(i) Into Surface water	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties	NIL	NIL
- No treatment		
- With treatment – please specify level of treatment		
(v) Others	₹	₹
- No treatment	NIL	NIL
- With treatment – please specify level of treatment	₹	₹
<b>Total water recycled (in kilolitres)</b>	<b>NIL</b>	<b>NIL</b>

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	NIL	NIL
<b>Total Scope 3 emissions per rupee of turnover</b>	-	NIL	NIL
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	NIL	NIL

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes , by M/s Mantec Consultants Pvt. Ltd. Noida.

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

There is a total of 03 no of ecological sensitive areas located in 10km of radius around our industry premises i.e., Protected Forest, Wildlife Sanctuary, Wet Land.

Significant aspects that may cause environmental impacts are as follows:

- a) Fugitive emissions of Chlorine, Emissions of HCl & unabsorbed Cl<sub>2</sub>, Emissions of PM, SO<sub>2</sub>, NO<sub>x</sub>, Deposition of PM & SO<sub>2</sub> on nearby area, Emissions due to venting of gases, Risk during venting of pressurised gas / liquid.
- b) Possibility of soil contamination due to improper disposal and/or transportation of solid and hazardous waste, Possibility of groundwater and soil contamination due to improper disposal/ storage of wastewater.
- c) Draining material mixed with groundwater and soil can cause damage to flora, fauna found in soil and Soil contamination and destruction of surrounding vegetation and associated biodiversity due to deposition of excess chlorine.

Prevention & Remediation Activities:

- a) Surface water quality will not be affected due to the industry as industry follows Zero Liquid Discharge policy (ZLD). Constant R & D is being done to Segregate the Effluent based on Quality i.e. High TDS & Low TDS & reduce the Quantity of Effluent generated. Accordingly Proper SOPs are in place for treatment of Waste Water. ZLD is achieved by recycling and reuse of treated wastewater from RO & MEE plant . Final hazardous solid waste generated is sent to PPCB approved Recycler and Permeate is pumped back to Process System.
- b) The concentration of the pollutants in the environment is maintained within the allowable limits as recommended by MOEF&CC, NAAQI and CPCB guidelines. Through PPCB & CPCB recommended APCD's, water scrubbers and Electrostatic precipitator, vegetation, and human settlements in the vicinity of industry is not likely to be affected. Provision of Caustic scrubbers for neutralisation of waste Cl<sub>2</sub> gas in the plant has been made. Standardized SOPs for critical operations are also followed. Industry has already taken adequate Safety measures to handle such like emergency situations by: Inbuilt Control mechanism in the Process operation system, Gas Detectors / Sensors at Critical / Hazardous locations in the plant to Monitor & initiate Safety Control mechanism to control / stop it's spread beyond the source of leakage and to Mitigate the Consequences of leakage, should it spread beyond the plant boundary. All such possible events & Worst case scenario leading to large scale spread of Cl<sub>2</sub> gas, have been postulated & effect thereof in terms of Dispersion in the Air vis - a vis Dose & Distance to which it may effect, has been studied through Dispersion Modelling using ALOHA software. Sensors are also being installed at the plant boundary facing towards adjoining villagers to monitor & ensure that no Fugitive Cl<sub>2</sub> escapes outside the plant.

6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Integrated Waste Management	Convert Hazardous waste in usable material like Spent Sulphuric Acid.	Conservation of natural resources Raw materials Reduction in usage of natural resources.

7. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

Yes, the industry has its 'On Site Emergency Plan' that covers all the possible Postulated Events / Scenario, such as leakage of gas from pipeline / valve, rupture of bullet and leakage of Chemicals along with their Risk Assessment, mitigation measures and their consequences analysis using WHAZAN model. It also includes Emergency & First Aid Procedures with defined responsibilities of key personnel that must be followed during the emergency.

For ensuring the continuity in our business, we already have prepared a document that outlines all the probable risks (social, financial, environmental, strategic risks) which have the potential to disrupt our business along with a comprehensive review of the mitigation measures that can immediately be implemented to smoothen the disturbances and ensure uninterrupted Continuity of our business.

8. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

Not any Significant adverse impact.

9. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

Not Applicable.

**PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.**

#### Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

Three.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers associations (State/National)
a)	Alkali Manufacture Association of India (AMAI)	National
b)	National Safety Council (NSC)	National
c)	Punjab Industrial Safety Council	State

- Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Not Applicable

### Leadership Indicators

- Details of public policy positions advocated by the entity:

S. No.	Public Policy Advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web policy Link, if available
1.	Advocating Chlorine Emergency Response Network. (CERN)	Provided toll free no to provide necessary help in case of emergency related to leakage of Cl <sub>2</sub> in that area.	Yes	Sent to AMAI on monthly basis.	<a href="https://amaindia.org/">https://amaindia.org/</a>
2.	Setting up of Oxygen plant in Govt. Hospitals & provide necessary guidance for O&M.	With the help of District Administration	-	As & when required by the Hospital Administration.	<a href="http://www.primochemicals.in/">www.primochemicals.in/</a>

## **PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**

### Essential Indicators

- Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Not Applicable

- Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

Not Applicable.

- Describe the mechanisms to receive and redress grievances of the community.

A mechanism is in place to interact with community leaders to understand and address their concerns, if any

- Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Parameter	FY 2022-23 Current Financial Year	FY 2021-2022 Previous Financial Year
Directly sourced from MSMEs / small producers	22%	17%
Sourced directly from within the district and neighbouring districts	2%	8%

### Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
N.A.	-

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

For this reporting period, the company did not undertake any CSR projects in designated aspirational districts.

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No

(b) From which marginalized /vulnerable groups do you procure?

Not Applicable.

(c) What percentage of total procurement (by value) does it constitute?

Not Applicable.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned / Acquired Yes / No	Benefit shared (Yes / No)	Basis of calculating benefit share
1.	NIL	-	-	-

5. Details of corrective actions taken or underway based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not Applicable

6. Details of CSR Projects & Beneficiaries: Your company's CSR initiatives focus primarily on beneficiaries belonging to vulnerable and marginalized section, hence almost entire CSR spending and coverage numbers qualify to be included under beneficiaries from vulnerable and marginalized section of the society.

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner**

### Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

The Company has a well-established setup for logging complaints for the existing customers through emails, letters and phone. Complaints are escalated and resolved within the time bound period depending on the nature of the complaint.

2. Turnover of products/services as a percentage of turnover from all products/services that carry information about:

	<b>As a percentage to total turnover</b>
Environmental and social parameters relevant to the product	100%
Safe and responsible usage	100%
Recycling and/or safe disposal	100%

3. Number of consumer complaints in respect of the following:

	FY 2022-23 Current Financial Year			FY 2021-2022 Previous Financial Year		
	Received during the year	Pending resolution at the end of year	Remarks	Received during the year	Pending resolution at the end of year	Remarks
Data Privacy	NIL	NIL	-	NIL	NIL	-
Advertising	NIL	NIL	-	NIL	NIL	-
Cyber-security	NIL	NIL	-	NIL	NIL	-
Delivery of Essential Services	NIL	NIL	-	NIL	NIL	-
Restrictive Trade Practices	NIL	NIL	-	NIL	NIL	-
Unfair Trade Practices	NIL	NIL	-	NIL	NIL	-
Other	26	NIL	Complaints pertain to lower quality material received at customer's end as compared to material dispatched	23	NIL	Complaints pertain to lower quality material received at customer's end as compared to material dispatched

4. Details of instances of product recalls on account of safety issues:

NIL

5. Does the entity have a framework/policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

The Company at regular interval carries out assessment of data piracy / cyber security tools.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

During the reporting period, there were no complaints or issues related to advertising and delivery of essential services, as well as cyber security and data privacy of customers. Additionally, no products were recalled in the current reporting year, and no fines or penalties were imposed, nor any regulatory actions taken regarding the safety of products or services.

### Leadership Indicators

1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

Information related to products and services of the entity can be accessed on the website of the company i.e. [www.primochemicals.in](http://www.primochemicals.in)

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

The Company adheres to relevant regulatory requirements by disclosing information to its stakeholders on the safe and responsible usage of products.

3. Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services.

The Company informs through emails and phone calls.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

The Company provides all relevant information regarding the products. We do not conduct survey, but our sales force remains in regular touch with the customers and collects relevant feedback from them relating to their concerns, their expectations or complaints. Customer feedback or complaints received from all sources is adequately addressed in a time-bound manner.

5. Provide the following information relating to data breaches:

- a) Number of instances of data breaches along-with impact

NIL

- b) Percentage of data breaches involving personally identifiable information of customers

Not Applicable.